

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

GORDON D. SONDLAND,

Plaintiff,

V.

THE UNITED STATES,

Defendant.

No. 21-2083C
(Judge Margaret M. Sweeney)

DEFENDANT’S UNOPPOSED MOTION FOR ENLARGEMENT OF TIME

Pursuant to Rules 6(b) and 6.1 of the Rules of the United States Court of Federal Claims, defendant, the United States, respectfully requests a 60-day enlargement of time within which to respond to the plaintiff's complaint. The United States' response is currently due on January 7, 2022. The extension would bring the date for responding to the complaint to March 8, 2022. This is the United States' first request for an enlargement of time for this purpose. Counsel for plaintiff Gordon D. Sondland indicated that he does not oppose this motion.

The requested enlargement is necessary because defendant has not yet received a litigation report and supporting documentation, required by 28 U.S.C. § 520(b), from the Department of State. Counsel for the defendant has spoken to the attorney at the Department of State who has been assigned to the case, who indicated that, especially considering the holiday season, more time is required to conduct fact investigations and to prepare a complete litigation report and supporting documentation. The parties' counsel have discussed the case in some detail, which will assist defendant in investigating further. Once defendant receives the complete report and documentation, we will require additional time to coordinate with the Department of State to prepare a response.

For these reasons, the defendant respectfully requests that the Court grant defendant's unopposed motion for an enlargement of time of 60 days, to and including March 8, 2022, within

which to respond to the plaintiff's complaint.

Respectfully submitted,

BRIAN M. BOYNTON
Acting Assistant Attorney General

PATRICIA M. McCARTHY
Director

s/Steven J. Gillingham
STEVEN J. GILLINGHAM
Assistant Director

s/William J. Grimaldi
WILLIAM J. GRIMALDI
Senior Trial Counsel
Commercial Litigation Branch
Civil Division
Department of Justice
P.O. Box 480
Ben Franklin Station
Washington, D.C. 20044
Telephone: (202) 616-0471
william.j.grimaldi@usdoj.gov

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Attorneys for Defendant